2013 Consumer and Commercial Products Survey:

Summary Questions and Staff Responses

This is a compilation of the most frequently asked questions regarding the 2013 Consumer and Commercial Products Survey (2013 Survey) reporting requirements. The questions are based on requests received in response to the webinars conducted July 22, 2014, and October 15, 2014. If you have questions not addressed here, please send an email with your questions to csmrprod@arb.ca.gov.

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Types of Products to Report and Not to Report (Survey Instructions, p. 3-4)

1. **Question:** Is any product sold in 2013 in California that is regulated for VOC content must be reported on. Is that correct?
   Answer: *Any consumer product that was sold in CA during 2013 needs to be reported for the 2013 Survey. This includes regulated categories in addition to survey categories that are not regulated, but are listed in Appendix A of the Survey Instructions.*

2. **Question:** We formulate some products that fall under the scope of the survey for retail locations that are on US Army and US Air Force bases in California. Do those retail locations have a reporting obligation for the survey? We know that sometimes these locations are exempt from State law and want to verify whether we should anticipate having to report formula information.
   Answer: *Yes, if products are manufactured for sale/use in California (including federal military locations), they must be reported.*

3. **Question:** Do the categories under 21000 Miscellaneous Household Products also apply to products for institutional use?
   Answer: *Yes, Institutional / Janitorial products must be reported.*

4. **Question:** Please confirm if products that are only used professionally (through doctor's offices, salons and spas), and not sold at retail, should be included in the survey?
   Answer: *Correct; any consumer product that was sold in CA during 2013 needs to be reported for the 2013 Survey. This includes consumer products that are used professionally.*

5. **Question:** Do vitamin supplements or diagnostics (e.g. pregnancy test kit) need to be reported?
   Answer: *Vitamins or other supplements ingested are not reportable. Also, pregnancy test kits are not reportable. For more information on what is not reportable, see* ***pages 3-4*** *of the Survey Instructions.*

6. **Question:** Could you please comment as to whether the category of "Other pet care products," survey code 31299, is intended to apply to ingestible pet supplements such as vitamins, pain relief, or soothing, calming tablets, ear washes, and pet toothpaste?
   Answer: *Drugs/supplements intended for ingestion are not subject to being reported for the 2013 Survey. However, ear washes, external pain analgesics, pet toothpaste, pet shampoos, pet stencils/paints, etc. must be reported.*

7. **Question:** Product Category – Personal Lubricant: Does that apply for hospital use or personal use?
   Answer: *Category Code: 30709 "Personal Lubricant" – all personal lubricants sold in CA would need to be reported. This includes those used in hospitals or healthcare facilities.*

8. **Question:** We are a haircare company with different lines of products sold in the market. Some of our products are manufactured in foreign countries but still sold here, in the US. Do we have to report these products in the survey as well? Also, we have a "professional" line of hair dye products as well. Do we have to report this information in the product information in the survey?
Answer: *Yes, it doesn't matter where the product is manufactured. If the product is sold in CA, it must be reported in the survey. Professional hair care products must be reported in the survey if they are sold in CA*.

9. **Question:** My understanding is that Industrial products are exempt from the Consumer Products Regulation, specifically "products that are incorporated into or used exclusively in the manufacture or construction of the goods or commodities at the site of the establishment." I wanted a little more clarification on this. We sell laundry detergents and other laundry cleaning chemicals to our customers. Would these products be excluded from the Consumer Product Regulations as they are used just to clean the dirty garments that the customer is selling/renting to their customers? If so, would this also exclude these products from the Consumer Product Survey Reporting requirements as well?
Answer: *The products you describe would need to be reported in the 2013 Consumer and Commercial Products Survey because they meet the definition for "consumer product."*

10. **Question:** The list of categories/codes provided contains cosmetics which are not regulated by CARB such as color cosmetics and other cosmetics (certain shampoos etc.) that are not regulated by CARB but may be required to be reported in the survey. Is it correct to say that any of the other non- regulated cosmetics that contain a VOC or LVP-VOC need to be reported on?
Answer: *All consumer products sold in 2013 (regulated or unregulated) must be reported. Low VOC and no VOC products must be reported as well. This information is important as low VOC and no VOC products are often used to support proposed lower VOC limits.*

11. **Question:** We have a large number of gift sets that contain a variety of products at different sizes. For example, a Christmas gift set contains a Body Exfoliant, Body Lotion, and a Shower Gel. If the three products have all been registered individually, does the gift set need to be registered as well? The formula for the products would be exactly the same, with the same VOC.
Answer: *Yes, the gift set needs to be registered as well.*
As to reporting requirements, because there are sales numbers for the items in the gift set, you will need to list the sales for the items that were generated from the gift set; then also list individual sales for each item that occurred outside the gift set for each item. You should, however, be able to group the products and provide one label and one formulation for each product.
For example, if a lotion was in the gift set, and that same lotion was sold individually; then you would report sales for the lotion as sold in the gift set, and

sales that the lotion generated independently. However, because the lotion has the same formulation in the gift set and independently, if all other grouping criteria are met, then formulation for the lotion can be reported once, and one label would need to be provided.

12. **Question:** Are products samples (e.g., small package samples which are not for sale) required to report in the 2013 survey?
    Answer: *Product samples are required to be reported. As these product samples often do not have a UPC code printed on the label/package, please use your company's internal SKU codes or similar tracking code in the Products section. Note: whatever code you use to identify these product samples, you will need to use the same code for each of the 3 survey reporting years*.

13. **Question:** Our company supplies candles into California but we are only selling un-scented candles. The label makes no claims to masking odors, freshening the air, or imparting any scent to the air. The candles are composed of paraffin wax only along with a wick. Based on this, I was wondering if we are required to complete the 2013 survey.
    Answer: *Based on the description, these products are not subject to 2013 Survey. Only scented candles are (Category Code: 20153 "Scented Candle") or products making air freshening claims.*

14. **Question:** Is an ink pad used for making stamps for arts & crafts a reportable product in the CPRT? If so, what is the best category to assign the product to?
    Answer: *Yes, the (ink) in the ink pad would be reportable. Please list the ink portion under Category Code: 20299 "Other Arts and Craft Supplies."*

15. **Question:** Do artificial Christmas trees, made of plastic and PVC need to be included on the Consumer Product Survey? If so, what Category would apply?
    Answer: *No, artificial trees, plants do not need to be reported for the 2013 Survey.*

16. **Question:** Does automotive transmission fluid need to be reported? If so, would it be reported in category 70299?
    Answer: *Automotive transmission fluids, diesel fuel treatments, engine oils, engine and/or radiator flush, engine treatment, gas treatment, octane booster, power steering treatment and/or flush, transmission treatments, etc. are considered fuels. Please do not report fuels.*

17. **Question:** I have a question regarding engine oils for automobiles and other vehicles. Are these considered as category 70299 "Other vehicle and marine vessel maintenance and repair products"? A different category I haven't found? Or not reported?
    Answer: *Engine oils are excluded from the Consumer Products Regulation. Please do not report them.*

18. **Question:** Could you please confirm that gasoline and diesel fuel additives intended only for addition to vehicle/vessel fuel either directly to the fuel tank or to stand alone storage containers/tanks are not covered by any of the product categories for which data are required in response to the 2013 Consumer and Commercial Products Survey?
__Answer:__ Correct, fuels are not subject to reporting for the 2013 Survey.

19. **Question:** Survey Code 70215-Oil additive: does this relate only to the engine oil or does it refers to any oils, like power steering oil, transmission, etc? There is nothing listed in your instructions about Oil Additive.
__Answer:__ No, oil additives do not need to be reported for the 2013 Survey; this product category was removed from the list of surveyed category. Please see Updated Appendix A.

Product Category Specific Questions (Appendix A, Instructions, p.7-8, 19)

20. **Question:** Is there a definition for 40100 Anti-microbial Agents? Is 40199 intended to apply to products such as water treatment biocides for use in cooling towers?
__Answer:__ Anti-microbial Agent is undefined. Although not specifically identified in the category list, please enter the cooling tower water treatment products in the applicable 21200 Pool/Spa/Whirlpool/Jacuzzi/Pond Products.

21. **Question:** As a marketer of automotive aftermarket products, we have a variety of automotive appearance and performance maintenance and detailing products. Looking through the List of Survey Product Categories, we notice that many of our products are not immediately listed. For example, fuel system cleaners, gas treatments, engine and radiator flush, octane booster, diesel fuel treatment, transmission treatment, power steering treatment and flush, engine treatment, automotive glass cleaner, anti-fog treatment, windshield repair, automotive interior cleaner, interior protectant, headlight cleaner and restorer, leather conditioner and cleaner, and engine cleaner. Please review and advise how these should be categorized within the respective sections 70100 Detailing Products and 70200 Maintenance and Repair Products.
__Answer:__ Some of the types of products you list are currently regulated. For example: Automotive glass cleaner: regulated as "Glass Cleaner" (20315 or 20316) Leather conditioner and cleaner: regulated as "Footwear or Leather Care Product" (21301 or 21304) Automotive interior cleaner: likely regulated as "General Purpose Cleaner" (20310 or 20311) Engine cleaner: likely regulated as "Engine Degreaser" (70210 or 70211) - unless this cleaner is used inside the engine. If so, it would not be reportable. Interior protectant: likely regulated as "Rubber/Vinyl Protectant (70111 or 70112) Fuel system cleaners: likely regulated/categorized as "Carburetor or Fuel-injection Air Intake Cleaner" (70209) - unless the product does not meet the definition as found in Appendix G. If it doesn't meet the definition for "Carburetor or Fuel-injection Air Intake Cleaner," do not report for the survey. Headlight cleaner and restorer: likely categorized as a "Single Purpose Cleaner" (20331)

Anti-fog treatment and Windshield Repair: categorized as "Other vehicle and marine maintenance and repair products" (70299).
The rest of the product types (gas treatments, engine and radiator flush, octane booster, diesel fuel treatment, transmission treatment, power steering treatment and flush, engine treatment) are considered "Fuels," and, therefore, not subject to the consumer products regulations = not reportable for this survey.

22. **Question:** If a product does not fall into the Category Codes such as non-fragranced cat litter and regular charcoal (non-lighter briquettes), what should be entered in that field?
    Answer: *For the unscented pet litter, it can be reported in the Category Code: 31202 "Pet Care Products (pet litter, etc.)." For the non-lighting charcoal, you can report it under Category Code: 20799 "Other fuels and lighter material." In general, for products that do not seem to fit into a product category, you can place them in the "Other…(XXX99)" category within the product group.*

23. **Question:** We make a water based leather dye and water based finishes for a client of ours that is used in the craft and hobby market. Would these be considered Leather Care products under category #21300? They are technically leather colorants and finishes.
    Answer: *Because the products are for use on leather, it is appropriate to report these products under one of the 21300 categories.*

24. **Question:** What type of products fall under 20299 Other arts & crafts supplies?
    Answer: *Because the 2013 Survey is so broad and comprehensive, it includes the ***99 categories as a catch-all for consumer products that do not readily fit into the listed categories. However, we anticipate that most products can be reported under one of the listed survey categories other than ***99 categories.*

Survey Applicability Determination: Responsible Party, Formulator, Private Labels

25. **Question:** If a product has multiple company names listed on the label, such as a manufacturer and a retailer, who is responsible for completing the survey for the sales information?
    Answer: *A retailer is responsible for completing the survey for the sales information. For example, if a Product X is manufactured by Company A for two big retailers Company B and Company C and they place their name on the label as "distributed by Company B or Company C," the Retailer (Companies B and C) will be responsible for completing all survey sections including sales except for the Product Ingredient section.*

26. **Question:** Company X has numerous wholly owned companies (Company A, Company B, and Company C.) The names of these companies appear on the product label. In some instances (not all) Company X name may appear (as

distributed by or manufactured for) along with its wholly owned company. Generally, the Company X headquarters address is listed on the label. Do you prefer we list Company X as the responsible party and identify the companies as divisions?
Answer*: Each of these companies would be considered a Responsible Party and would need to complete separate responsible party CPRT screens. For instance, you would complete a separate responsible party screen for Company A and at the bottom of the screen in the Parent Company section you would enter Company X.*

27. **Question:** We have one question regarding a private label client:
As a contract manufacturer, we have a private label client who wants us to do everything having to do with the CARB survey. Even though we are not the responsible party, is it possible for us to submit data as if we were the responsible party?
Answer*: Yes, as a contract manufacturer (Formulator in this case), you can submit data on behalf of the Responsible Party. However, the Certification section must to be completed by an authorized representative (Management Level) for the Responsible Party, certifying that all information submitted in this survey is true, accurate and complete. Please see* ***page 40*** *of the Survey Instructions*
In addition, please notify us that you are submitting data on behalf of Responsible Party by sending email to General Consumer Products Email Box: csmrprod@arb.ca.gov , so we can contact you in case of questions.

28. **Question:** Company A is a manufacturer of automotive fluids (Antifreeze, Brake fluid, and Windshield washer fluid). We sell our product to automotive original equipment manufacturers (OEM). We do not package product for the aftermarket. Our fluid ships to a packager who then ships to a distributor. Hence we don't know how much of the product ends up in CA. We believe that we are not responsible for completing this survey. Do you agree?
Answer*: (If these fluids are placed into the vehicle by the OEM at the manufacturing facility in order to make the vehicles drivable out of the factory.) Based on this information, it sounds like you would not be a Responsible Party and not be subject to reporting for the 2013 Survey.*
However, you might be a formulator if a distributor brings these fluids into California. In this case, you might be contacted by a Responsible Party (i.e. distributor) with the request to provide ingredient data to ARB.

29. **Question:** We are a consumer product company that manufacturing candles and air fresheners. We also manufacturing candles for several big retailers and they place their name on the label as “distributed by retailer name.” My question is how do I know or obtain the retailer info like, survey contact, gross annual receipt, employees, contract employees etc. This information may be confidential to the retailer that they may not disclose to us.
Answer*: For the situation you describe you will have separate roles.*

1. For the products (candles and air fresheners) that you formulate and label with your company name, you will need to: a) fill out the Responsible Party information for your company, b) complete the Product Information i.e. product name, UPC-level sales, etc. c) and you will also complete the Product Ingredients section because your company holds the ingredient information.

2. For the Retailer products (candles and air fresheners) that you formulate, but label with the Retailer's company name, you ONLY need to complete the Product Ingredient section. The way the CPRT works is that the responsible party (i.e. the Retailer) will be responsible for completing all survey sections EXCEPT for the Product Ingredients section.

In the "Formulator" button section, the Retailer will enter your company contact information. In the "Product Information" button section, the Retailer will enter the product name & UPC-level sales information, and identify that your company will provide the ingredient information to ARB. The Retailer will then be able to generate a CSV file to email to you.

You will be able to upload this CSV file into a "Formulator CPRT," (available on ARB 2013 Survey Website) select the product name from the dropdown menu, and enter the product ingredient information for the products that your company holds ingredient information for. After January 1, 2015, you would be able to submit this information to ARB through a secure upload portal.

30. **Question:** We are uncertain whether we will be a 'responsible party' to participate in the survey. The only products with VOC would be aftersales products such as cleaning agents which have our logo on them. Our own products, i.e., the vehicles, would not be affected. Wouldn't it make more sense if the manufacturer of those aftermarket products themselves responded to the survey instead of us?

    Answer: *To clarify, all consumer products (including no and low VOC products) must report for the 2013 Survey.*

    Manufacturers of aftermarket chemically formulated consumer products would need to respond to the 2013 Survey if the manufacturers have their name listed on the product label. Having their name listed on the consumer product label makes them the responsible party.

31. **Question:** We (Company A) have some private label product that we own and distribute however do not manufacture. The product is sourced by a vendor (Company B) who gets it manufactured by third party (Company C). In this case who is considered/designated as formulator?

    Answer: *Company A is the Responsible Party. Company C is the Formulator.*

Getting Started and Other General Questions

32. **Question:** When reporting for more than one company does it need to be done on a separate computer or is there a way to somehow have two separate CPRTs on one computer?

Answer: *If you are reporting for more than one company, the CPRT can be saved in two separate folders (e.g. Company 1, Company 2, etc.). Please note that you have also create two subfolders (data "backup" and "output") within each of these folders to avoid overwriting.*

33. **Question:** We operate two different companies at our facility. How do I enter the second Responsible Party's corporate information?
Answer: *You would need to download two separate CPRTs – save and rename them according to each company. Only one responsible party per CPRT would be listed.*

34. **Question:** We are in the beginning stages of trying to understand the survey requirements. Do you recommend using the CPRT Import Template if we'd like multiple people to work on this survey? We would like to have individual departments add their own areas of expertise at different times. Is the CPRT Import Template the preferred way to go?
Answer: *Yes, using the import template would work best if you intend to have multiple departments work on the survey. Please remember not to change or move the columns or headers as you will have difficulty when the time comes to import.*

35. **Question:** We are a small company that has approximately 100 products that we will be both the responsible party and formulator for and probably another 100 that we will be the just formulator for. Do we want to start with CPRT Consumer Product Reporting Tool (Access) or the CPRT Formulator Import Template (Excel)? Can we get ahead and work on the formulating section before a responsible party section has been created? Between this and the GHS conversion work we need to be as efficient as possible since there are only a few of us and this is only a fraction of our workload.
Answer: *The steps for the survey process are outlined below. 1) as the Responsible Party (RP), 2) as the Formulator. You may review Survey Instructions for more details.*
1) For the Products that you are both the RP and the Formulator, you would:
   - *a) Download the CPRT*
   - *b) Use the setup/maintenance features to customize the reporting tool – review instructions*
   - *c) Enter the RP contact information*
   - *d) Enter the Formulator contact information – in this case you would select "self" and complete the applicable data field*
   - *e) Enter the Fragrance Formulator contact information (if your products have a fragrance)*
   - *f) Review your product formulas to decide if you meet criteria to group your products. Review instructions for product grouping. Product grouping allows RPs to submit one representative product label and one representative formula*

g) Decide if you will use the manual entry function or the import template.

2) As the Formulator for other company's (clients) – you can begin collecting the formula information for those products:

a) Review the formulas and modify them in-house according to ingredient reporting instructions i.e., deciding which ingredients can be Grouped LVPs, Grouped Inorganic Compounds, etc.
b) Wait for your clients to email you the CSV files that contain product ID information (formulators are not able to enter/import data before receiving the Client CSV files)
c) After receiving the CSV files, download the CPRT for formulators (CPRTF) from ARB website
d) Use the setup feature to customize the reporting tool – review instructions for formulator tool
e) Enter your company information
f) Enter your client information – this is where you import your clients CSV file and complete remaining data fields
g) Enter Fragrance Formulator information if applicable
h) Decide if you will use the manual entry function or the import template (review instructions for formulator tool).

Note: The client CSV files list the product naming convention (product name/formula name) and include tracking information to allow ARB staff to connect and link RP data to the ingredient data. The RP does not have access to the ingredient data you submit to ARB.

36. Question: One of our products had been discontinued starting March of 2013. Do we still have to report it in the survey?
***Answer**: Yes, please still report product's sales and other requested information and add a note that this product had been discontinued XX, 2013 in the Comment field at the bottom of the Product Information screen.*

37. Question: I have a question regarding data input for the survey. My company owns more than 20 private label brands, each labeled with a different distributor, i.e. "responsible party". However, the tool doesn't give the option of adding more than one responsible party. Is it acceptable to complete a separate tool/database per distributor? As we are not familiar with the submission process, we wanted to make sure that there would not be a problem with submitting more than one tool.
***Answer**: Please create a folder for each of the responsible party companies. Download and Save an individual copy of the CPRT in each folder for each company.*

38. Question: When you state that retailers will be responsible to complete all survey sections EXCEPT for the product ingredient section, this means working on their own survey or share in completing our survey (manufacturer)?

Answer*: Two CPRT's are available for users to enter or upload product information. The primary CPRT will hold the Responsible Party (RP) information, Product Information (Product Name/UPC/Sales), and for those RP's that hold the formula in-house, the RP will be able to complete the Product Ingredient section in the primary CPRT. There is also a Formulator CPRT (CPRTF) specifically for formulators to upload the CVS files from the retailer into their own Formulator CPRT. The CVS files are scrubbed of confidential data. This is only the information needed by the Formulator to be able to provide ingredient info is shared.*

39. **Question:** If we sell products that are formulated by another company, what is the process to notify the formulator to enter in the formulation in the reporting tool, what happens if the formulator does not respond?
Answer: *If the Responsible Party (your company) does not hold the product formulation information, this section will be completed by the Formulator. The product formulators are required to submit ingredient data to ARB directly by using the Consumer Products Reporting Tool for Formulators (CPRTF).*
In this case, the Responsible Party will enter information for the Product Name and the Product ID data fields; then generate the CSV file with this information and send it to the formulator for the completion of the ingredient information. This type of CSV file is generated by clicking the "Export Formulator Data" button on the Main Menu screen. For more information, please see Survey Instructions, ***page 30.***

40. **Question:** Retailer will generate CSV file and email it to us (formulator)… how will this kind of communication take place … do we contact them … do they contact us… time frame/due date commitment for exchanging and providing the right info?
Answer: *The retailer will be responsible for contacting their formulators. From September – December, we anticipate that much of the data gathering and communication will take place between the retailers and formulators. The survey is due to ARB March 1, 2015.*

41. **Question:** For private labels, what is the notification that a formulator will receive that tells them they need to enter a formulation into the reporting tool for a retailer? Is it a formal request through the reporting tool, or some other mechanism?
Answer: *The retailer of private-label products will be responsible for contacting their formulators. The mechanism is similar to the one described above.*

42. **Question:** If retailers enter the product by UPC# and we, according to the survey instructions, entering the product by SKU, how this will work together… I'm addressing this now to alert ARB for a conflict that may arise between product ID and number of units between retailer and manufacturer?
Answer: *As the Formulator in this instance, you would not be entering the product UPC or SKU (for finished products that do not have a UPC # printed on*

the product label.) This information would be entered by the Responsible Party (RP.) The RP would send the names of the products (i.e. product formula names) to your company as a CSV file. As the formulator, your company would upload this CSV file into a CPRT specifically for formulators. After opening the Formulator CPRT, you would be able to select the names of the products that you hold ingredient information for, and enter that product's ingredients into the Formulator CPRT.

43. **Question:** If we are a formulator company, does it mean that we should have no obligation to enter or report UPC/SKU sales info for a product that has a name on the label rather than ours. Examples for names on the label that trigger RP responsibility are "Made for…", "Distributed by…", "just our name", etc. So, I need to make sure that we should have no obligation toward 2013 CARB survey if any of the retailers or the distributers failed to report products that we manufactured for them?
Answer: *Yes, the obligation for completing the 2013 Survey rests with the Responsible Party – as defined in the Consumer Products Regulation. The Responsible Party is obligated to report UPC/SKU sales and product information. Formulators are obligated to provide ingredient information to ARB and are obligated to work with the Responsible Parties to comply with statutory requirements of the survey.*
As a Formulator for a Retailer, you would not be responsible for providing product name /UPC level sales, etc.; just the formula data for the products.

44. **Question:** My understanding is that although I may complete all the work on formulations that I file as a responsible party, if I am the formulator or distributor for another Responsible Party (RP), I must wait until they complete their portion of the survey and send me the file. Have I understood this correctly? What obligations do I have to "force" a responsible party to act, beyond bringing the requirements to their attention?
Answer: *The onus for completing the 2013 Survey is on the RP. We encourage RPs and formulators to be in communication during this survey process to facilitate the generation of the required data. If you are having difficulties with obtaining the information from your RPs that you need in order to submit the ingredient data, please communicate this to ARB.*

45. **Question:** We manufacture Personal Care Products for a number of different Private Label (PL) Customers. These companies have their names and addresses on the products' labels, which makes them Responsible Parties. We don't have California sales data for PL products and our PL Customers don't have our formula information. We need more information on how the CARB Survey reporting works in terms of coordinating between us, as a PL Manufacturer, and our PL Customers.
We learned that we can't preemptively send the data we have on these products to CARB; instead we have to wait for our customers to send us the exported "formulator data" from the CPRT. And only then we will have to use the CPRT for

Formulators to link our customers' products to our formulas. As the deadline of March 1st, 2015, for submittal of data to CARB appears to be the same for us and for our customers, this potentially puts us in an untenable situation with regards to on-time submittal. Please advise.
Answer: *You are correct (last paragraph) regarding the process for 2013 Survey data submittal. Although you cannot enter data into the CPRTF until you receive the CSV files (Formula Name and Product Names etc.) from your Client's, you should be in communication with them throughout the process.*
ARB staff recommend that you begin compiling the ingredient data for products that you manufacture for retailers and have it ready for when you receive the CSV client files. Among the early action steps you can take now is to review the product formulations and modify them (in-house) according to survey reporting instructions. Ie. identify which ingredients must be speciated, which ingredients can be grouped, etc.

46. **Question:** Assuming that I am a formulator or contract packager, and my customer (Responsible Party) sends me the file to complete as the formulator. However, I buy the product as a concentrate or full formulation from a third party. Will this information be visible to the responsible party?
Answer: *ARB staff is aware of situations like this and the accompanying confidentiality concerns. The CSV file that the Responsible Party (RP) sends to you doesn't contain any confidential information. And, as the Formulator you do not send the RP your formulation information – this confidential information will be sent to ARB directly thru the secure Import Portal, available after January 1, 2015. The only transmittal that your RP would receive is a confirmation email that you (as their formulator) submitted the ingredient information to ARB on their behalf. They do not have access to the raw data you submit to ARB.*

47. **Question:** We are a pretty small company, however, some of us have 64 bit operating systems and some 32. Would it be possible for several employees to report data? Are the two versions compatible?
Answer: *The reporting tools are stand-alone tools with a single user, single computer interface. It was not designed for multiple users to access concurrently via a network drive or spread apart on multiple PCs. So the issue of compatibility doesn't really need to be addressed. If the company wants to have multiple people doing parts of the survey, we would recommend that they facilitate these interactions import template. The templates would have to be appended to one master template by a single user (let's just call them the "admin" user), then imported into a master reporting tool.*
If multiple reporting tools are used via the "point and click" interface, then a lot of overwriting can occur and we cannot ensure the completeness of the data. Another route could be to "back up the data" then the admin user would have to go through all the various "formulator" or "ingredients" CSV files and copy and paste into a "master" CSV. By doing this to all the CSV files, they could "restore" onto a single computer the compilation of all the data sources.

Responsible Party: Completing Mailing Address (Survey Instructions, p.10-12)

48. Question: Some of our products are manufactured in foreign countries but sold here, in the US. How do we have to enter their mailing address?
Answer: *For Responsible Party brands manufactured outside of USA: If the Responsible Party is located in a foreign country, in the section requesting address, please enter the street address and foreign city name. Enter the country in the data field for state. For example, you would list the foreign city street address, foreign city name, in "State:" you would enter "Country name," In the "zip code" field you might have to enter "1" to be able to close out the screen.*

Responsible Party: NAICS Codes Reporting (Survey Instructions, p.12)

49. Question: We have a question about the NAICS codes for the 2013 Survey. There are three fields to choose from (Primary, Secondary and Tertiary). Should we select the codes by importance? In other words, the "primary" is our most important product; "secondary" is our next important product and; "tertiary" is our third most important product.
Answer: *This would be a good approach.*

50. Question: Should we list the codes for products that our company deals with in California or list the codes for products that our company deals with worldwide?
Answer: *Choose the NAICS codes for the typical brand products shown on your company website*.

51. Question: Can you please advise which North American Industry Classification Code to use if we develop and market cosmetic products. Our products are made at third party manufacturers using formulas developed by us. Do we use the code for All Other Miscellaneous Chemical & Preparation Manufacturing 325998?
Answer: *You can choose either All Other Miscellaneous Chemical & Preparation Manufacturing 325998 or 446120 Cosmetics, Beauty Supplies, and Perfume Stores.*

52. Question: We are a hair care company that a 3rd party to manufacture our products. Which NAICS code would apply to us?
Answer: *Your company might be categorized as: 446120: Cosmetics, Beauty Supplies, and Perfume Stores (the NAICS list, under RETAIL). If this doesn't fit your company, choose a category that closely matches. A complete list of 2012 NAICS is available at:*
https://www.census.gov/cgibin/sssd/naics/naicsrch?chart=2012

Responsible Party: Contract Employees Information (Survey Instructions, p.12)

53. Question: I have a question regarding the "contract employee" portion of the CPRT. How is "contract employee" defined? Does that include temp, consultant, contractor and/or contract services?

Answer: *Correct. "Contract Employee" would include temp, consultant, contractor, and/or contract services. As these numbers are often fluid, choose a general number of employees that best describe the overall number throughout the year.*

54. **Question:** Contract Employees – Cannot access how many International contingent employees are involved. What is the best approach to determine the number?
Answer: *Contract employees – just give best case judgment. This information is sometimes used during an economic assessment of potential rulemaking; mostly to determine company size.*

Responsible Party: Parent Company Information (Survey Instructions, p.13)

Question: We are in the process of filling out the 2013 Consumer & Commercial Products Survey but had a question in regards to the parent company information. Our parent company is located in Japan, in this case is it a must that we input this information? If so, will the survey take if we do not put the info for state etc.?
Answer: *The CPRT should work, as the parent company data fields are not required information. I.e., not all responsible parties have a parent company. For this section, we recommend that you enter the street address, etc. for the city in Japan. Under "State," enter Japan. This should be sufficient.*

Product Grouping (Survey Instructions, p.17-20)

55. **Question:** We have a professional line of haircare which has over 100 hair colors. Most ingredients are the same, but are somewhat different. Do we have to enter each (over 100) formula into the formulation data? Or can we choose 1 hair dye for each line to input?
Answer: *You will need to review the ingredients for each of the hair colors. You are allowed to group (submit one representative product formulation) if the products meet the grouping criteria as described on **page 17** in the 2013 Survey Instructions.*

56. **Question:** I am having an issue with the new version of the CPRT. It allows me to enter information for a group of products, but does not allow me to choose a group when entering in the individual product information. I am able to see the dropdown list of groups from which to choose, but I am unable to select one. Please advise.
Answer: *It might be an order of operation error. I.e., you need to enter the product name, UPC, Kit information first. Then you should be able to select the product group name from the dropdown menu.*

57. **Question:** Looking at "Product Grouping" instructions I don't see that products with SAME formula just different brand name can be reported as a group.

We have 3 different brand names, but we use same formula (only difference will be the label showing the different brand); can I report these products as a group? If I can, how can this be done using the Access program?
Answer: *If you are the RP for these three products, then you can group by "size" and only submit one formula. If you are the Formulator for these products, then you must submit 3 separate formulas.*

Labels Reporting (Survey Instructions, p.19)

58. **Question:** When using the data entry template how are labels imported? Can we upload a separate file containing all the product labels required? Do we have to go back to the tool and attach each individual label for each group? If so what is that process? Was this information in the instructions and I missed it?
Answer: *The labels are not actually imported into the CPRT. You can create and save a folder with all of the individual label files. The label files will be named according to the naming convention described in the instructions. I.e., the label file name needs to match the name you entered in the "Image File" data field (including file type, *.ps, *.pdf, etc.) Beginning January 1, 2015, you will be able to import all files including the label files into ARB's https web portal.*

59. **Question:** Like most manufacturers we are converting all labels to GHS. We can provide the archived 2013 version of the product labels. However, they will not be what the consumer sees in the very near future. Please confirm you are asking for the 2013 archived labels.
Answer: *You have the option of either providing the 2013 version of product label or the updated GHS label.*

60. **Question:** I would like to know what quality definition you are requiring on these label graphic files. The attachment is a snippet of one of our products that has been downloaded into Word. As we are not sure of what you would be looking for, I don't know if the Word doc would be sufficient for your requirements. Please let me know if this type of document is OK for your requirements or if a higher quality definition is required.
Answer: *A higher quality definition is required. The language and graphics must be easily viewable. The rule of thumb for submitting labels: Is the text easily viewable? If the text cannot easily be read (as is) or cannot be easily read when enlarged on the screen, then the label submission is not acceptable.*
61. **Question:** If an old product underwent reformulation and the reformulated product was launched only in November 2013, which formula is to be reported? Which label is to be reported? The majority of sales data for 2013 in this case will be for the old product.
Answer: *Report the most recent formulation. Aggregate the sales for both iterations of products. Submit the most recent product label.*

62. **Question:** For the "Image File" section can you please specify what is needed? According to the instructions label is defined as:

"any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, or appearing upon any consumer product or consumer product package, for purposed of branding, identifying, or giving information with respect to the product or to the contents of the package" According to that definition most items would require multiple image files. Please note even in entering files for the outer packaging there may be multiple files.
Answer: *Updated survey instructions provide some examples. You would need to submit all label graphic materials. You would likely need to combine all of your image files for a product and save it as one *pdf file for submission.*

63. **Question:** Within the same year many items will have had updates to the packaging. Is it necessary to enter information for all versions of the packaging for the same item?
Answer: *You can submit the most recent iteration of the product label.*

64. **Question:** Can I reduce the number of labels to be submitted?
Answer: *You need to submit a copy of a product label for each UPC sold in California. However, there are several options for grouping products (as per instructions) – which may reduce the number of actual labels submitted. For example, if a product is "grouped" because it is sold in multiple sizes, you only need to provide one representative label. Similarly, if you group products based on color or fragrance, you only need to provide one representative label*.

Product Information: UPC Specific (Survey Instructions p.21-23)

65. **Question:** I am trying to set up product grouping varying by size and fragrance. Do I still have to enter all the UPCs anyway?
Answer: *Yes, you will still need to enter all of the UPCs and sales, etc. into the CPRT. The grouping selection allows for the submittal of one representative product formulation and product label for the group of products.*

66. **Question:** The field will take 9 digits but UPC codes are 10 digits long and in your instructions, it says that you can even include the front digit and the check digit if we want and that would make it a 12 digit number. Can you check the field size setting for this and let me know what to do?
Answer: *This has been corrected in the CPRT.*

67. **Question:** If we have used the same UPC code and the formula was changed significantly during the year, which formula do I use in the survey? The changes that I see are to non-VOC components such as inorganics or surfactants, but the % are changed enough so I cannot use the same formula.
Answer: *You will need to provide ARB with the most recent formula.*

68. **Question:** If we have used the same UPC code and the fragrance was changed during the year, which fragrance vendor and number do I use in the survey?

Answer: *You will need to provide ARB with the most recent fragrance name, vendor, and number.*

69. **Question:** What do I do if one product actually has two fragrances in the formula sold by two different fragrance vendors? How do I list them in the system? For the above, I have several instances of each situation and we sold the two sizes, two fragrances, two formulas, etc. in 2013. I am interpreting SKU number to be the digits under the bar code on the back label
Answer: *For this, you will enter the fragrance name, vendor, and number used MOST in the product. In the comment section, you would need to note that this product uses 2 separate fragrances – and provide the fragrance name, vendor, and number as a comment. For the Product Ingredients section, you would aggregate the amount of total fragrance and select grouped "Fragrance" from the dropdown menu.*

70. **Question:** How should a product be submitted if it does not have a UPC associated with it?
Answer: *If your product does not have a UPC-code, please use the SKU, or other related tracking number. However, please note that whatever number is chosen should be the same for each reportable year of the survey.*

71. **Question:** We have kits that are combos of other products, and which have their own UPC. Can we just include the volumes of those individual products in their own UPC rather than the Kit UPC? Example is a 4 pack of 4 different hand washes that are wrapped together for the big box stores. The 4 pack has its own UPC but when you unwrap it, each individual bottle in the pack has its own label and its own UPC. Wouldn't it make more sense to put the volumes with the individual UPCs than create a kit and components in the system?
Answer: *Because the CPRT and 2013 Survey is intended to track UPC sales over time, the combo product kit UPC needs to be used.*
Although your company's kit products have individual UPCs for each product in the kit, this is often not the case. This is why the CPRT data entry process requests the use of the kit product UPC, rather than the individual kit components.

Product Information: Sales (UPC Units Sold) and Data Collection Method (Appendix I; Survey Instructions, p.24)

72. **Question:** I have a question regarding unit sales for 2013 – is this only what we sold in California?
Answer: *Correct. Please only report units sales for California. If your computer tracking systems do not calculate California specific sales, you are allowed to prorate the sales. 2013 Survey Appendix I has a table for calculating prorated CA sales based on population.*

73. **Question:** Is sales data number of a product sold in the state of California in a year OR number of products shipped in the State in a year?
    Answer: *Sales data is the number of products shipped/supplied into the state of California for sale in California if direct sales data are not available.*

74. **Question:** With regards to “data collection method,” what do we do if our sales data was not collected by any of the four choices in the CPRT? Can you also provide clarification on the four choices?
    Answer: *If sales data were collected in a way other than California specific or by prorating (other three options besides CA specific that are available from the dropdown menu), you can type “other” in the “Data Collection Method” field and describe how sales were collected (or if different prorating method was used) using the “Comment” section at the bottom of the Product Information screen.*
    If sales data were estimated by prorating sales data by population, please see population estimates from 2013 provided in Appendix I: U.S. Resident Population.

Product Information: Mass/Volume Filled (Survey Instructions, p.24)

75. **Question:** Re: Mass/Volume filled, our factories have a mass fill number for all products that includes the density in its calculations and is reported in grams. Can I just use that gram mass for our products sold in Volume?
    For example, a 16 fl. Oz Product with a density of 1.036 has a fill weight of 504.8 grams. Can I just enter the grams? It would save me and you time.
    Answer: *Yes, entering grams is fine.*

76. **Question:** Our company has some products with a net contents by count, e.g., number of facial cleansing cloths, dryer sheets instead of ml or gm. What do we need to enter in the mass/volume fields?
    Answer: *For these situations, in the “mass/volume filled” data field report only the mass or volume of liquid (or other substance) in the impregnated substrate (i.e., impregnated wipes/towels/cloths/sheets/pads.) In the “Size on Label” data field, report the mass or volume that is listed on the label.*
    The “Mass/Volume Filled” data field is what is used for emissions calculations. The “Size on Label” data field is used as a “check” for label information and is not used to calculate emissions

77. **Question:** If an item has one UPC, like a bundle of 8 soap bars each weighing 113 grams, then do you want me to put 113 grams or 904 grams as the fill weight?
    Answer: *You would put 113 grams in the “mass/volume filled’ data field – as the “8” in the “multi-pack” field is part of the internal CPRT calculation to equal the 904 grams total package. For the size as listed on package – this data field is not used in calculations, but we use it in ARB staff review of product information etc. For this data field, you would just list the size of the individual product, i.e., soap = 113 grams.*

78. **Question:** If we have used the same UPC code for a product that had a size reduction during the year, for example 18 fl oz was dropped to 16 fl oz, which size do I use in the survey? Do I need to use a weighted average?
__Answer:__ We will not be asking for a weighted average. Instead, we ask that you use the most recent weight, and note in the comment section that the weight has changed.

Product Information: Density Reporting (Survey Instructions, p.24)

79. **Question:** If a volume is entered we need a density. I understand we can assume a density of 1.
Answer*: The default density value in the CPRT is 1 g/mL. For products entered as volume, you would need to change the number in the "density" data field from "1" to the density of the product, i.e., "0.98."*

Product Information: Product Size Reporting (Survey Instructions, p.24)

80. **Question:** The form requests that we enter both "Size on Label" and "Container Fill (g or mL)". The directions state "Product Size on Label: List the size of this product (record size directly from the Product Label)". How is this different from the Container Fill? Also for the product "size on label" and the "container fill (g or mL)" fields currently they are set to numeric entry only; alpha characters are not allowed. So for these fields there is no way to specify if the numbers entered are grams, milliliters, inches, centimeters, etc.
Answer*: For many products the "size on label" and "container fill" will be the same. However, there are some products, especially aerosol products that are overfilled for weights and measures product dispensing requirements. ARB staff needs to account for the "product overfill" for accurate emissions inventory purposes. The updated CPRT changed "container fill" to "mass/volume fill." Updated survey instructions provide clarification.*

Fragrance Reporting Related (Survey Instructions, p.28)

81. **Question:** My fragrances are used at less than 0.5 percent. Do I still have to list extra details for their entry?
__Answer:__ Yes, for all fragrances (> 0.1 weight percent) you will need to provide the fragrance details of: Fragrance Name, Fragrance Formulator, and Fragrance Tracking Code.

82. **Question:** Each of fragrance compounds are less than 0.1 percent. Do we have to report them and how?
__Answer:__ You would aggregate and account for these compounds in the grouped total "Fragrance" dropdown list if the sum of all aggregated compounds is more than 0.1 Wt.%.. However, if total aggregated fragrance compounds are still less than 0.1 Wt.%, you would report them as "Grouped VOCs that are each less than

0.1 Wt.%." In this case, please make a note in the Comment field at the bottom of the screen.

83. **Question:** We have a question: Each product has a field for "Fragrance Name", "Fragrance Formulator" and "Fragrance Tracking Code". What if our products have multiple fragrances? How do we enter more than one?
Answer: *We request that you enter the most representative fragrance in the fields. If products have more than one fragrance, please enter the information in the comment section at the bottom of the screen. For example: for the second (or third) fragrance, in the comment section enter: Fragrance Name: Lavender; Fragrance Formulator: Joe's Fragrance House; Fragrance Tracking Code: LAV1234.*
If the additional fragrances are in equal amounts, choose either one to enter into the data fields. The remaining fragrance information can be entered into the comment section.

84. **Question:** In the CPRT Import Template, there is a column listed as "fragrance sales tracking." Can you please explain what information needs to be entered into that column?
Answer: *Please be sure you are using the updated CPRT import template, posted 10/14/14. The column was renamed "Fragrance Tracking" - hovering the mouse over the column header provides further clarification for each column header. The fragrance tracking code is the tracking code/invoice # associated with the fragrance purchased from the fragrance formulator.*

85. **Question:** How do we handle the situation when one product line uses two different fragrances in the manufacturing process?? This is not an either/or situation. We use both fragrances in the process. We can add another 'Fragrance' and 'Fragrance Supplier' column to the template. Or we can add another row or rows, and keep adding as needed, and filling the new empty fields with the original data from the first line. This solution will leave the original template in place but I wanted to add this scenario for consideration, and if there is another way to do it.
Answer: *Please do not modify the import template by adding columns as it will cause problems when you try to import. Instead, list the additional fragrance information as a comment in the comment column. For example: "Lavender, Joe's Fragrance, Lavender1353" would be listed in the comment column for the additional fragrance in the product. If a third fragrance is added, the comment field would look something like this: "Lavender, Joe's Fragrance, Lavender1353 Fresh Scent, Joe's Fragrance, FreshScent4440"*

86. **Question:** For items that have multiple fragrances there is currently no way to enter more than one fragrance. We understand that one should enter the fragrance that contributes the most to the overall product percent weight wise yet we have items where there are three fragrance contributed equally to the item. There are items that have three fragrance names, three fragrance sales codes

and in some cases three fragrance formulators for the same exact item. How would we enter those items properly?
Answer: *You would enter the most representative fragrance information into the CPRT data fields. In the comment field you would then enter the information for the additional fragrances as a comment. If 3 fragrances are used, (equally) choose one to enter in the fragrance data field, then in the comments you would list the fragrance name, fragrance sales code, and fragrance house. For the ingredient section, you will be able to aggregate the fragrance and enter the total amount.*

87. Question: There was a question about the fragrance percentage is exempt if it is under 20%, but still requires reporting. I calculate theoretical VOC percentages on new products for our company based on the ingredients and typically include the fragrance as a 100% contributor. Did I hear this answer correctly that the fragrance needs to be reported, but would not be considered exempt in the regulated % VOC allowed in a product? So if a product had a 0.5% limit, and we put in 1% fragrance that would be ok?
Answer: *The 2% fragrance exemption is for Regulatory purposes. For the 2013 Survey you need to report the fragrance ingredient.*

Formulations: Ingredients Reporting (Survey Instructions, p.30-33)

88. Question: A question has been brought up by my colleagues in regards to the requirements for the VOCs and LVPs. Has the requirements changed for these from the previous survey instructions?
Answer: *Yes, ingredient reporting requirements have changed. Please review the instructions for 2013 Survey ingredient speciation requirements.*

89. Question: I have items from the Appendix C List of Chemicals and these don't have CAS numbers in the Appendix. Do I still have to get the CAS numbers?
Answer: *If a compound chemical name is listed in the dropdown menu in the CPRTF, the Chemical Abstract Service (CAS) number will automatically be populated. If a compound is not listed, manually enter the CAS number. The CAS number for the compound or mixture must be obtained from your supplier.* ***Note:*** *If your supplier does not provide a CAS number, please contact ARB staff by email at:* ***csmrprod@arb.ca.gov.*** *Please include the name of the ingredient and, if available, the tradename and manufacturer in the email. ARB staff will reply to confirm the absence of the CAS number or provide users with the appropriate CAS number to use in the CPRTF.* ***Note:*** *If there is no a CAS number assigned to your chemical in Appendix C or the dropdown list, it is not needed.*

90. Question: We have many raw materials that we use to formulate our products in which we do not know the ingredients because it is considered confidential business information. So, for example, let's say that product X is formulated with 10% of a raw material and we do not have access to the VOC content of that raw material but we know the rest of the ingredients. How would we report this?

Would I note in the survey the contact info of the manufacture of the raw material and then they would in turn be responsible for giving you the VOC? If so, who then would calculate the actual VOC for the said product?
Answer*: For clarification, we do not ask survey respondents to calculate the VOC content of their submitted products. We request listing the ingredients – which ARB staff then calculate the VOC content.*
Regarding the raw materials used to formulate your products: you would report the raw material mixture as one ingredient – listing the tradename as the chemical name. Include the CAS# if available. In the comment section you can say that 10 % of raw material mixture is a trade secret.

91. **Question:** How do I complete the Product Ingredient Form when I am the formulator and have all of the chemical names and CAS#s for the components except for one component where the MSDS that does not declare a CAS#, only Proprietary.
Answer: *There are some compounds that may not require entry of a CAS #. If it truly does not have a CAS# assigned, then it is ok to omit the CAS#. If the CPRT does not allow the blank CAS #, enter "1" in the data field to continue.*

92. **Question:** As I am creating the formulas, I find that I have formulas that have very low amounts of some of the LVPs you want reported separately. How would I enter "Compound A" at 0.03% when you want formulas to the 0.1% level? Do I just add it to the grouped organics? Or do I put it in at 0.1% grossly exaggerating the amount really in the formula? I am finding the same for very low levels <0.05% of "Compound B" in some formulas.
Answer: *You would aggregate and account for these compounds in the "Grouped LVPs" dropdown list.*

93. **Question:** You have a great list of the LVPs. Is there an easy list of the VOC and exempt VOC chemicals as well?
Answer: *No there is not, but we do have a definition for VOC and a list of excluded VOCs in our definitions section of the Consumer Product Regulation. This link will take you to the regulation and the definition for a VOC is listed in Appendix G: http://www.arb.ca.gov/consprod/regact/2013surv/2013main.htm*

94. **Question:** Is it only VOC's, fragrances, specified LVP-VOC's and other specified inorganics that comprise at least 0.1% of the formula?
We have a lot of raw materials, such as glycolic acid, etc. that are used above 0.1% and are not on your lists. Should we list them as well? And if we combine the said ingredients, do we put the total weight of all the combined ones in the Wt. Percent section?
Answer: *Non-VOC materials, except those LVP-VOCs and Inorganic Compounds specifically listed, do not need to be speciated. Compounds that are non-VOC and not on the Appendix D list may be aggregated into the "Grouped LVP" or "Grouped Inorganic Compound" categories. Or if a company chooses, the chemicals can also be reported as speciated. .*

95. Question: Do we group ingredients that are over 0.1% or do we list those individually?
Answer: *You individually list all VOC and the Appendix D ingredients >0.1wt %*

96. Question: It seems that we can group the VOC compounds with less than 0.1% together. Do we put the total wt percentage of the grouped ones in the wt percent section?
Answer: *Correct, you put aggregated weight % of the grouped VOCs <0.1%. Select "Grouped VOCs that are each less than 0.1 Wt. %" from the dropdown menu.*

97. Question: What if the VOC compound is greater than 0.1%? Do we list those individually?
Answer: *Yes, you would list those individually.*

98. Question: Do we group all the inorganic compounds together no matter what the wt percentage is? Also, do we put the total wt percentage of the grouped ones in the wt percent section?
Answer: *You would aggregate the inorganic compounds (that are not required to be individually listed) and list the total under "Grouped Inorganic Compounds" from the dropdown menu.*

99. Question: I had a question regarding the substances listed on appendix D: LVP-VOC to report. If a substance is on this list does that make it a VOC? There are some substances that I thought were considered an exempt VOC. i.e., Dipropylene Glycol Methyl Ether Acetate, CAS#88917-22-0. Can you please clarify? I am trying to find solvents that are considered an exempt VOC so I do not include it in our VOC calculations. All the solvents are under 0.1 mm HG @20C. So would I have to include them in my VOC contribution?
Answer: *Dipropylene Glycol Methyl Ether Acetate CAS#88917-22-0 is not an exempt VOC.*
The substances listed on appendix D are low vapor pressure (LVP)-VOCs. Although the listed substances must be individually reported in the 2013 Survey, because they meet the consumer products regulatory definition for LVP-VOC, they are not included in the calculation of a product's VOC content. Also, as a reporter, you do not assign a VOC, LVP-VOC, inorganic, etc. designation to the chemical. ARB staff will handle this assignment.

100. Question: If my LVP ingredients are not specifically outlined on Appendix D in mentioned in the instructions, it appears that I can group inorganics and group LVPs to simplify my formulation, is that correct? Or maybe for me it would be better to call ingredients like Surfactants LVP, Moisturizers LVP, Colors LVP- does it really matter how I distinguish my ingredients as long as I understand and the VOCs, Fragrance, and specific LVPs are itemized?
Answer: *You can report it either way – whichever is more convenient for you.*

101. Question: Does stearyl alcohol (CAS # 112925), a solid with no/negligible vapor pressure count towards a product's VOC content? Is stearyl alcohol a compound that needs to be listed on its own in "Formulations" in CPRT or may it be grouped into Grouped LVPs?
Answer: *Stearyl alcohol can be grouped into Grouped LVPs.*

102. Question: Where do silicone materials fall in the survey? They contain carbon moieties but are mainly inorganic in composition. Should they be considered inorganics or organics?
Answer: *Non-volatile silicon-based organic polymers, (NOT volatile methyl siloxanes (VMS)) are considered Grouped LVPs. Aggregated "Grouped LVPs" are listed in the ingredient dropdown menu.*

Formulations: Hydrocarbon Solvents Reporting (Survey Instructions, p.31)

103. Question: If we have any Hydrocarbon solvents, we need to identify the Manufacturer, Trade Name and BIN. Where can we find the BIN?
Answer: *Correct, for Hydrocarbon solvents you would need to identify the manufacturer, trade name, and Bin #. This information is available in Appendix E, List of Hydrocarbon Solvent Bins.*

104. Question: There is no bin number for the "hydrocarbon" we are using. Can you modify the definition of hydrocarbon solvent so that ingredients like this don't fit the definition? Or can you provide guidance on this?
Answer: *A: Per the survey definition of "Hydrocarbon Solvent," it could be "a single compound, such as hexane, or a complex mixture of compounds such as alkanes, branched alkanes, cycloalkanes, and aromatics that contain only the elements hydrogen and carbon (e.g. mineral spirits, naphtha, petroleum distillates, xylenes, stoddard solvent, aromatic 100/150)."*
Specific requirements to report Bin#, trade name and manufacturer name are for petroleum distillates (which are hydrocarbon solvents produced from crude oil) and are complex mixtures. Some of examples are provided above.
If the compound in question is a single compound, no Bin number needs to be provided. For example, if the compound in question meets the definition of "LVP-VOC" and is not listed in the Appendix D (LVP-VOCs that must be individually reported, it can be reported as "Grouped LVPs" or combined with other grouped LVPs if present.

105. Question: Does a BIN# need to be provided for LVP hydrocarbon solvents?
Answer: *Specific requirements to report Bin#, trade name and manufacturer name are for hydrocarbon solvents which are complex mixtures of alkanes, branched alkanes, cycloalkanes, and aromatic compounds.*
Hydrocarbon solvents that meet the definition of "LVP-VOC" are listed in Appendix D: "LVP-VOC, Inorganic, and Group Total Ingredients to Report" and,

yes, if these are complex mixtures, their Bin # must be also reported. Please see Appendix E "List of Hydrocarbon Solvent Bins" for help.

106. Question: If a raw material is purchased for use in a product and the raw material is a mixture of substances some of which are VOC's which must be reported is it correct to use the trade name and manufacturer for the reported VOC for the mixture. i.e. you purchase raw material with the trade name of "BUY ME". "BUY ME" is a mixture of non-volatile organics of 80% and 20% volatile, ethanol. When reporting the ethanol is the correct tradename for the ethanol, "BUY ME"?
Answer: *You only need to include the Trade Name, Manufacturer, and Bin # for Hydrocarbon Solvents. Examples of hydrocarbon solvents include: odorless mineral spirits, VM&P naphtha, petroleum distillates, etc.*
If for example, you are using total of 10% Buy Me in your product and 20% of Buy Me is ethanol, you would only need to list 2% Ethanol (no trade name/manufacturer). The remaining 8% can be aggregated with and included in the total Grouped LVPs. (Assuming that the other ingredients are not required to be speciated out as per instructions.)

107. Question: Would a BIN# not be required for a hydrocarbon solvent that is not a petroleum distillate, but a discrete chemical substance? Example: Would a BIN# need to be provided for Isooctadecanol CAS# 27458-93-1?
Answer: *No Bin # is required for a solvent which is a single chemical compound. For example, n-Tridecane (CAS# 629-50-5) is listed in Appendix D ("LVP-VOCs to Report") and has to be speciated. No Bin# needs to be reported.*

108. Question: We have several vendors that provide use a blended raw material for our products which do not have a cas#. Some of the suppliers do provide a cas #, but only applies to a certain percentage of the raw material. How do I report these items?
Answer: *ARB staff recognize this is often the case with blended material ingredients. In these cases, list the name (likely a tradename) of the blended raw material in the "chemical name" data field, leave the CAS# field blank, and list the wt%.*

Transferring data between older and newer CPRT versions (Specific Instructions)

109. Question: How do you transfer info from an old version to a new one?
Answer: *You can go to the Setup/Maintenance section. Click the "Backup Data" button and save files to a directory. Then you can download the most recent CPRT version; go to the Setup/Maintenance section. Click "Restore Data" button, select the saved file, and click ok. This will upload the data from the old CPRT into the new CPRT.*

110. Question: The restore function on the version 1.01 is not importing any formulation information from the earlier version. The product and formulator data is being restored from Version 1.0.

Answer: *To successfully restore data from a previous CPRT version to the new 1.01 version you need to manually change some of the column headers in two of the backup .CSV files prior to uploading them. We have posted specific instructions on how to do this on our website:* *http://www.arb.ca.gov/consprod/regact/2013surv/cprt/v10_v101_restore.pdf. This step will not be necessary for any subsequent new tool versions we may release in the future*.

Aerosol Coating Products Reporting

111. Question: I understand that manufactures of aerosol coatings don't need to report formula information for the 2013 Survey. I don't see any screen just to enter Sales information for coatings sold in CA during 2013. Can you please tell me what screen to use?
Also, are we required to upload labels for the aerosol coatings?
Answer: *For Aerosol Coating Products, you would need to enter the responsible party (RP) information. Completion of the RP section activates the "Products" button (for manual entry), or the "Import Products" button for importing CSV files. Click the applicable button to continue.*
After clicking the "Products" button, the "Products Information" screen opens to allow entry of product sales. For aerosol coating products, you would complete the data entry on this screen for each aerosol coating product UPC sold in CA during 2013. For Aerosol Coating Products: In the "who will provide the formulation?" data field, you will select "NR" from the dropdown menu. NR means not required/not reportable. You would also name each image file according to the naming convention described in the survey instructions.
You will be required to submit product labels for each aerosol coating product or group of aerosol coating products.

Other Questions

112. Question: Trying "to delete multiple category codes at once". I have highlighted 10101-30601 and I don't see a "Delete" button. A right click does not give me a menu. Please advise.
Answer: *It is easier to delete the entire list and add the category codes that you want:*
Setup/Maintenance button, click ARB Category Codes. Click Empty List. It's probably easiest to have a print out of Appendix A, list of survey categories to look at because it has the list of category codes and category names.
Type the category code into the "lookup code" field. Click add.
To confirm the category was added, click "view/edit list". The code and category name should be listed.
Repeat for each category you want to add. If you forget and want to add a category later, you should be able to follow these steps.

114. Question: I don't see that the current survey utilizes a Product Tracking# like past surveys.

Answer: *Yes, correct, no 'Product Tracking Number' (the terminology used in 2006 Survey on the 'Contacts for Ingredients' form) is utilized in the Consumer Product Reporting Tool (CPRT). In cases when the Responsible Party does not hold the formulation information, the Responsible Party will enter information for the Product Name and the Product ID data fields; then generate the CSV file with this information (company code or client code, client name, and formula name) and send it to the Formulator for the completion of the ingredient information.*

For more information, please use the link below and select: Updated "Survey Instructions," page 30 (under "Instructions and Appendices"): http://www.arb.ca.gov/consprod/regact/2013surv/2013main.htm. To allow formulators to submit ingredient data to ARB, staff has developed the Consumer Products Reporting Tool for Formulators (CPRTF). For more information, please use the link above and select: Updated "Survey Instructions for Formulators."

115: Question: What happens if the responsible party forgets to report a product after they have submitted their report and the March 1st deadline has passed?
Answer: *As with past surveys, ARB staff will likely have a mechanism for RP's to update/amend submitted data. This process is still under development.*

116: Question: Regarding the 2013 Consumer & Commercial Products Survey and the associated reporting tools I am having difficulty understanding what products are to be classified as VOCs.

Appendix G, Consumer Products Definitions includes the following definition, in part: "Volatile Organic Compound (VOC)" means any compound containing at least one atom of carbon, excluding [list of a few simple compounds and many fluorinated compounds]. Is this the definition we are required to use to classify compounds as a VOC? This is just the definition of an organic compound (ignoring the exemptions).

Continuing this would mean that "VOC" would include every compound (or nearly) listed in Appendix D in the "LVP-VOCs to Report." Taking the first item from that list, 1,3-Butanediol contains at least one atom of carbon and is not specifically exempted in the above quoted definition.

As another example Stearyl alcohol (CAS 112925), an important personal care products ingredient listed in Appendix C, also contains at least one atom of carbon and is not specifically exempted and thus appears by that definition to be classified as a VOC despite being a solid with negligible vapor pressure.

If the above definition from Appendix G is not applicable then where may we find a list of what organic materials are "classified as a VOC"?

The old version of CPRT had a limited list of chemicals which appeared to be a list of VOCs, LVP-VOCs to report, and Inorganics to report – which would make

sense as we have specific compounds to report and can group all others – but in the update CPRT now appears to contain everything in Appendix C.
Answer: *Appendix C is a reference as it lists the chemical names and CAS #'s that have been reported to ARB in previous surveys. This includes VOCs, LVP-VOCs, Inorganic Compounds, etc and can be used as a reference – to provide consistency in chemical naming and CAS#s.*

All compounds that contain at least one carbon atom are a VOC. However, for regulatory purposes, ARB staff have identified a subset of VOCs with lower vapor pressures (LVP-VOCs). These LVP-VOCs that meet the regulatory definition for LVP-VOC are not counted toward a product's VOC content.

Appendix D is a subset of Appendix C. Appendix D includes a list of LVP-VOCs, along with specific inorganic compounds that ARB staff requires to be individually reported in the 2013 Survey. Because these ingredients have a low vapor pressure, they are not counted toward products VOC content. However, ARB is in the middle of an LVP-VOC research project to evaluate use of these compounds in consumer products. Individual reporting of the ingredients listed on Appendix D will support this research.

The CPRT allows users to customize the list of ingredients for use in reporting in the "Formulations" section later. The lookup chem name / CAS # feature allows users to select from the list (Appendix C) those ingredients to add to the shorter (view/edit list).